

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

ANDREY ALISHAYEV,

Plaintiff(s),

-against-

JUDGMENT RECOVERY PARTNERS
LLC, TYLER UMANS, JAMES W. OLSEN
And RIVER HEIGHTS CAPITAL, LLC,

Defendants.

Case No. 1:25-CV-2075

MOTION FOR PRO HAC VICE ADMISSION OF MATTHEW S. MARRONE

Pursuant to Rule 1.3 of the Local Rules of the United States District Courts for the Southern District of New York, I, Joseph A. Oliva, am a member in good standing of the United States District Court of the Southern District of New York, there are no pending disciplinary proceedings against me in any state or federal court and I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court.

I hereby move this Court for an Order for admission for Matthew S. Marrone to practice Pro Hac Vice to appear as counsel for Defendants Judgment Recovery Partners LLC, Tyler Umans and James W. Olsen in the above-captioned action.

Matthew S. Marrone's contact information is: Goldberg Segalla LLP, 1037 Raymond Boulevard, Suite 1010, Newark, NJ 07102, Email: mmarrone@goldbergsegalla.com and Telephone: 267-519-6851.

In support of this motion, the undersigned relies upon the accompanying Declaration of Sponsor for Admission *Pro Hac Vice* of Matthew S. Marrone, Declaration of Pro Hac Vice

applicant Matthew S. Marrone, Matthew S. Marrone's Certificates of Good Standing and the Proposed Order.

Dated: New York, New York
July 2, 2025

Respectfully Submitted,



Joseph A. Oliva, Esq.

GOLDBERG SEGALLA LLP

Attorneys for Defendants

**JUDGMENT RECOVERY PARTNERS
LLC, TYLER UMANS and JAMES W. OLSEN**
711 3rd Avenue, Suite 1900
New York, New York 10017
T: (646) 292-8700 / F: (646) 292-8701
joliva@goldbergsegalla.com

GS File No.: 7854.0142

TO: THE LAW OFFICE OF AHMAD KESHAVARZ

Ahmad Keshavarz, Esq.
Attorneys for Plaintiff
ANDREY ALISHAYEV
16 Court St., 26th Floor
Brooklyn, NY 11241-1026
Phone: (718) 522-7900 / Fax: (877) 496-7809
ahmad@NewYorkConsumerAttorney.com

MESSER STRICKLER BURNETTE, LTD.

Lori J. Quinn, Esq.
Attorneys for Defendant
RIVER HEIGHTS CAPITAL, LLC
49 W. Jericho Tpke, #1004
Huntington, New York 11746
Phone: (646) 779-8653 / Fax: (312) 334-3473
Ljquinn2messerstrickler.com

CERTIFICATE OF SERVICE

I, Joseph A. Oliva, attorney for Defendants **JUDGMENT RECOVERY PARTNERS LLC, TYLER UMANS and JAMES W. OLSEN** do hereby certify that on this **2nd day of July, 2025**, a copy of the foregoing MOTION FOR ADMISSION PRO HAC VICE OF MATTHEW S. MARRONE, DECLARATION OF SPONSOR, DECLARATION OF MATTHEW S. MARRONE, CERTIFICATES OF GOOD STANDING and PROPOSED ORDER, have been served via filing through the USDC SDNY CM/ECF site via electronic transmission to the email address(es) designated by said attorney(s) for that purpose via CM/ECF, within the State of New York upon the following:

THE LAW OFFICE OF AHMAD KESHAVARZ

Ahmad Keshavarz, Esq.

Attorneys for Plaintiff

ANDREY ALISHAYEV

16 Court St., 26th Floor

Brooklyn, NY 11241-1026

Phone: (718) 522-7900 / Fax: (877) 496-7809

ahmad@NewYorkConsumerAttorney.com

MESSER STRICKLER BURNETTE, LTD.

Lori J. Quinn, Esq.

Attorneys for Defendant

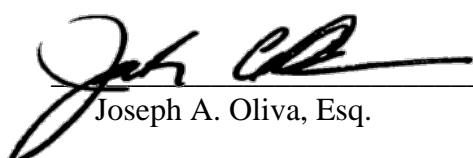
RIVER HEIGHTS CAPITAL, LLC

49 W. Jericho Tpke, #1004

Huntington, New York 11746

Phone: (646) 779-8653 / Fax: (312) 334-3473

Ljquinn2messerstrickler.com



Joseph A. Oliva, Esq.